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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 UNITED STATES OF AMERICA,) Case No. 18-CR-00258 EJD
15 Plaintiff,)
16 v.) DECLARATION OF KELLY I. VOLKAR IN
17 RAMESH "SUNNY" BALWANI,) SUPPORT OF UNITED STATES' OPPOSITION
18 Defendant.) TO DEFENDANT'S MOTION TO RECONSIDER
) ORDER DENYING MOTION TO STRIKE
) PORTIONS OF SARAH BENNETT'S
) TESTIMONY
19) Date: June 13, 2022
) Time: 10:00 a.m.
20) Court: Hon. Edward J. Davila

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1 I, Kelly I. Volkar, declare:

2 1. I am an Assistant United States Attorney (AUSA) representing the United States of
3 America, the plaintiff in this case.

4 2. Attached hereto as Exhibit 1 is a true and correct copy of a cover email produced in
5 discovery with Bates label THPFM0002435587.

6 3. Attached hereto as Exhibit 2 is a true and correct copy of a document produced in
7 discovery starting with Bates label THPFM0001954626.

8 4. Attached hereto as Exhibit 3 is a true and correct copy of a document produced in
9 discovery starting with Bates label THPFM0000275729.

10 5. Attached hereto as Exhibit 4 is a true and correct copy of a document produced in
11 discovery starting with Bates label TS-1049216.

12 6. Attached hereto as Exhibit 5 is a true and correct copy of a document produced in
13 discovery starting with Bates label THPFM0005218989.

14 7. Attached hereto as Exhibit 6 is a true and correct copy of a document produced in
15 discovery starting with Bates label THPFM0003612503.

16 8. Attached hereto as Exhibit 7 is a true and correct copy of a document produced in
17 discovery starting with Bates label THPFM0004664960.

18 9. Attached hereto as Exhibit 8 is a true and correct copy of a document produced in
19 discovery starting with Bates label THPFM0005487131.

20 10. Attached hereto as Exhibit 9 is a true and correct copy of a document, produced in
21 discovery with Bates label THPFM0003858486, and its attachment, produced in discovery with Bates
22 label THPFM0003858487.

23 11. Attached hereto as Exhibit 10 is a true and correct copy of a document produced in
24 discovery starting with Bates label TS-1048773.

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12. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Walnut Creek, California, on June 12, 2022.

DATED: June 12, 2022

/s/ Kelly I. Volkar
KELLY I. VOLKAR
Assistant United States Attorney